

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

TRACI L. JONES,)
)
Plaintiff,)
) **CIVIL ACTION NUMBER:**
v.)
) **CV-08-CV-01599-KOB**
FREEDOM RAIN, TLC and)
BRENDA SPAHN,)
Defendants.)
)

ANSWER

COME NOW Defendants Freedom Rain Ministries and Brenda Spahn in response to the Plaintiff's complaint and state:

1. Response to Paragraph 1: No response required.
2. Response to Paragraph 2: The Defendants admit that this Court has jurisdiction.
3. Response to Paragraph 3: The Defendants admit that venue is proper.
4. Response to Paragraph 4: Defendant Freedom Rain Ministries admits that the Plaintiff is its former employee. Defendant Spahn denies that the Plaintiff is her former employee.
5. Response to Paragraph 5: Denied.
6. Response to Paragraph 6: Defendant Freedom Rain Ministries is a non-profit corporation which operates the Lovelady Center, a Christian, faith-based

facility that houses, feeds and ministers to, *inter alia*, women recently released from prison and to their children. Denied.

7. Paragraph 7: Denied.

8. Response to Paragraph 8: Denied.

9. Response to Paragraph 9: The Defendants admit that Plaintiff is a former employee of Freedom Rain.

10. Response to Paragraph 10: The Defendants admit that Plaintiff is a former employee of Freedom Rain.

11. Response to Paragraph 11: Denied.

12. Response to Paragraph 12: Denied.

13. Response to Paragraph 13: Denied.

14. Response to Paragraph 14: Denied.

15. Response to Paragraph 15: Denied.

16. Response to Paragraph 16: Denied.

17. Response to Paragraph 17: Defendants admit that Defendant Freedom Rain is Christian, faith-based facility that encourages and all persons, including its employees and the women who live in its facility, to pray regularly.

18. Response to Paragraph 18: See response to Paragraph 17.

19. Response to Paragraph 19: Denied.

20. Response to Paragraph 20: Denied.

21. Response to Paragraph 21: Denied.
22. Response to Paragraph 22: Admitted.
23. Response to Paragraph 23: Denied.
24. Response to Paragraph 24: Denied.
25. Response to Paragraph 25: Denied.
26. Response to Paragraph 26: Denied.
27. Response to Paragraph 27: No response required.
28. Response to Paragraph 28: Denied.
29. Response to Paragraph 29: Denied.
30. Response to Paragraph 30: Denied.

Respectfully submitted,

s/ David R. Donaldson
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Attorneys for the Defendants, Freedom Rain
and Brenda Spahn

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September, 2008, the foregoing document has been filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Thomas F. Talty
Thomas Talty & Associates
2015 First Avenue North
Birmingham, AL 35203

s/ David R. Donaldson
OF COUNSEL